

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

ALPHONSO DAVID,

Plaintiff,

v.

**THE HUMAN RIGHTS CAMPAIGN AND
THE HUMAN RIGHTS CAMPAIGN
FOUNDATION,**

Defendants.

Case No. 1:22-cv-00620

Judge Roanne L. Mann

Jury Trial Demanded

JOINT STATUS REPORT

Pursuant to this Court's September 23, 2022, Order ("Order"), the Parties submit the following status report:

Defendants have clarified that the requests referenced in the Order are limited to the time period from June 1, 2019, through the present. In light of that clarification, and the Court's Order, Plaintiff will promptly produce any documents responsive to Defendants' Requests 45, 46, and 71 as narrowed, and to Defendants' Requests 77 and 78.

The Parties mutually believe a reasonable extension of the current discovery schedule is necessary to complete discovery in an orderly and efficient manner. Pursuant to this Court's standing order, the Parties will contemporaneously file separately a joint letter motion for extension of the discovery schedule and update the Court on the progress of discovery to date.

Dated: October 12, 2022.

/s/ Evan D. Parness

Kim J. Askew (*pro hac vice*)
Brian S. Kaplan
Evan D. Parness
DLA PIPER LLP (US)
1251 Avenue of the Americas
27th Floor
New York, New York 10020-1104
Phone: 212.335.4782
Fax: 917.778.8577
Email: Evan.Parness@us.dlapiper.com
Kim.Askew@us.dlapiper.com
Brian.Kaplan@us.dlapiper.com

Attorneys for Defendants

Respectfully submitted,

/s/ Matt Singer

Linda D. Friedman (*pro hac vice*)
Shona B. Glink
Jared A. Calvert (*pro hac vice*)
STOWELL & FRIEDMAN, LTD.
303 W. Madison St., Suite 2600
Chicago, Illinois 60606
Phone: 312-431-0888
Fax: 312-431-0228
Email: lfriedman@sfltd.com
sglink@sfltd.com
jcalvert@sfltd.com

Matthew J. Singer (*pro hac vice*)
MATT SINGER LAW, LLC
77 West Wacker Dr., Suite 4500
Chicago, Illinois 60601
Phone: 312-248-9123
Email: Matt@MattSingerLaw.com

Attorneys for Plaintiff